

June 29, 2017

**BY ELECTRONIC COMMENT FILING SYSTEM**

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW, Room TW-A325  
Washington, DC 20554

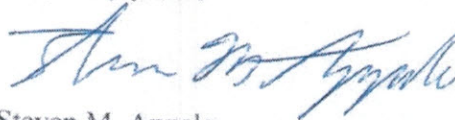
Dear Ms. Dortch:

Re: WC Docket No. 14-58 –  
FCC Form 481 due July 3, 2017 -  
Western Wahkiakum County Telephone  
Company (Study Area 522451)

Accompanying this letter for filing with the Federal Communications Commission ("Commission") is an electronic copy of the FCC Form 481, due July 3, 2017, of Western Wahkiakum County Telephone Company, as filed electronically with the United States Administrative Company pursuant to Sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422.

Please let us know if the Commission has any questions regarding the accompanying FCC Form 481.

Very truly yours,



Steven M. Appelo  
President

Accompanying document:  
FCC Form 481 (copy)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Carol Larson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	clarson@west.net
	Form Type	54.313 and 54.422



(300) Unfulfilled Service Request  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<300> Unfulfilled service request (voice)	0
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<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WASHIAKUM
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**[500] Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAUKIARUM
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		522451WA510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	522451
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<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@wweat.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	522451wa610.pdf



<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKOM
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<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

[illegible]

<010>	Study Area Code	522451
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net
<810>	Reporting Carrier	Western Wahkiakum County Telephone Company
<811>	Holding Company	Wahkiakum West Inc.
<812>	Operating Company	Western Wahkiakum County Telephone Company

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	360452211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@weest.net
<900>	Does the filing entity offer tribal land services? (Y/N)	No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF. on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form

Page 11

FCC Form 481

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July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604552211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522451wa1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 522451wa1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
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<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**

**Lifeline**

**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

522451WA1210.pdf

**<1210> Terms & Conditions of Voice Telephony Lifeline Plans**

Name of Attached Document

<1220> Link to Public Website ☐ HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

**(2005) Price Cap Carrier Additional Documentation****Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(iii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	
<2024A>	Round 2 Recipient of Incremental Support?	
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	
<2025A>	Round 2 Recipient of Incremental Support?	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)





Name of Attached Document Listing  
Required Information

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan  
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment

Name of Attached Document Listing Required  
Information

522451WA3010B.pdf

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(iii)}

No - No New Community Anchors

(3012B) Please Provide Attachment

Name of Attached Document Listing Required  
Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(Yes/No)

☒ ☐

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☒ ☐

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required  
Information

WWCTC 2016 RUS Operating Report.pdf

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or

☐

(3020) (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required  
Information

## (3005) Rate Of Return Carrier Additional Documentation (Continued)

## Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
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<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

## Financial Data Summary

(3027) Revenue	3579255
(3028) Operating Expenses	2938470
(3029) Net Income	260238
(3030) Telephone Plant In Service(TPIS)	21305128
(3031) Total Assets	11460821
(3032) Total Debt	4634251
(3033) Total Equity	4443894
(3034) Dividends	158000

<010>	Study Area Code	522451
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<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information \_\_\_\_\_

**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information \_\_\_\_\_

**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information \_\_\_\_\_

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
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<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	WESTERN WAHIAKUM
Signature of Authorized Officer:	CERTIFIED ONLINE
	Date 06/27/2017
Printed name of Authorized Officer:	Steven Appelo
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	3604652211 ext.
Study Area Code of Reporting Carrier:	522451
	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

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<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@wwest.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<03>	Contact Email Address - Email Address of person identified in data line <03>	clarson@west.net
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18.0

<703>

[illegible]

FCC Form 481  
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[illegible]

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<810>	Reporting Carrier	Western Wahkiakum County Telephone Company
<811>	Holding Company	Wahkiakum West Inc.
<812>	Operating Company	Western Wahkiakum County Telephone Company

[illegible]

**FCC FORM 481 (July 2017), Line 510**  
**Descriptive Document for Service Quality Standards &**  
**Consumer Protection Rules Compliance**  
**Per Instructions for Completing FCC Form 481**

This document details the processes and procedures that Western Wahkiakum County Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protection rules as set forth in the Instructions for completing FCC Form 481. It applies with respect to both the Company's voice telephone service and the Company's broadband service.

For service quality standards that relate to plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically trained and reviewed on issues involving service quality standards and consumer protection rules, including Identity Theft Prevention (Red Flag) and Consumer Propriety Network Information (CPNI) rules. In particular, if any set of issues appears to be prevalent, employees are given additional training on how to handle such issues.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed. It should be noted that the Company has received no customer complaints in the past six years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which are not caused by the Company.

**FCC FORM 481 (July 2017), Line 610**  
**Descriptive Document for Functionality in Emergency Situations**  
**Per Instructions for Completing FCC Form 481**

At line 600 of FCC Form 481, Western Wahkiakum County Telephone Company (the "Company") certified that it is able to function in emergency situations as set forth in 47 C.F.R. 54.202(a)(2). This means that the Company has a reasonable amount of backup power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement describes how the Company is prepared to provide continued service in an emergency situation and applies with respect to both the Company's voice telephone service and the Company's broadband service.

The Company's network providing voice telephone and broadband service includes two (2) central offices and twenty-two (22) digital loop carrier sites ("DLCs"). The two central offices are equipped with back-up batteries having a capacity to provide reserve power in the event of a power outage for up to approximately eight (8) days, while the DLCs are equipped with batteries having a capacity to provide reserve power in the event of a power outage for up to approximately two (2) days. The Company also maintains fixed back-up power generators at its two central office locations and at the locations of three (3) of its more significant DLCs. There are automatic power transfer switches at each of those five locations, so in the event of a commercial power failure, the transfer to back-up power should occur seamlessly. The Company also maintains three (3) portable generators to be transported to the remaining locations, if needed. All locations are subject to status alarm monitoring that is connected to the Company's principal central office.

The Company has three (3) fiber cable rings that provide redundancy and diversity connecting the Company's principal switching facilities with one another and connecting a number of the remote DLC locations with their serving switching facility. The Company's broadband service also utilizes these fiber cable rings for transmission and benefits from the redundancy and diversity they provide.

Each of the Company's fiber-connected sites has built in redundancy for fiber transceivers. Most of the Company's switching and other electronic/optronic equipment utilized in providing telephone service and broadband service has some redundancy built in, and the Company keeps critical-spare replacement components on hand. The Company also subscribes to support service from the principal vendors of its switching and transmission equipment.

The Company has system redundancy for interexchange access service circuits (including as utilized by its affiliate to provide long distance service), E-911 trunking and SS7 signaling circuits.

Most of the Company's outside plant cable and wire is buried and thus protected from most weather events. The Company's central office switch capacity is engineered to accommodate traffic spikes, and its interexchange facilities also have the capacity to provide additional circuits for interexchange carriers should the need arise. The existing 120 interexchange trunks serving interexchange carriers provide a substantial margin of safety for traffic spikes and may be utilized for the traffic of all interexchange carriers to whom the Company provides switched access service. The middle-mile broadband capacity presently available to the Company substantially exceeds the current busy-period through-put requirements of the Company's

installed broadband service, and thus is believed by the Company to provide adequate reserve capacity for potential broadband traffic spikes.

In the case of isolated groups of customers whose service may suffer impairment due to a cable cut, the Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time, subject to road accessibility and environmental limitations. The Company's emergency service equipment is located within its service area and requires very little time to dispatch.

**FCC FORM 481 (July 2017), Line 1010**  
**Descriptive Document for Compliance of Pricing of**  
**Fixed Voice Services with Required Relationship**  
**To Applicable National Average Urban Rate for Voice**  
**Service Benchmark, as required by 47 C.F.R. § 54.313(a)(10)**  
**Per Instructions for Completing FCC Form 481**

Section 54.313(a)(10) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that the pricing of the Company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 17-167, released February 14, 2017, in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following statements, "Based on the survey results, the 2016 [sic]<sup>1</sup> rate floor for voice services is \$22.49, [footnote omitted] and the reasonable comparability benchmark for voice services is \$49.51. [footnote omitted] . . . In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 3, 2017, that the pricing for its *basic residential voice* services is no more than \$49.51. [footnote omitted]" [Italics added.]

It is the Company's understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.<sup>2</sup>

Those components for the Company's basic resident voice telephone services as of June 1, 2017, are as follows:

Recurring residential service rate	\$18.00
State subscriber line charge rate	0.00
State universal service fund rate	0.00
Minimum mandatory EAS rate	0.00
Federal subscriber line charge	6.50
Total \$	24.50

The sum of the above-identified rates (\$24.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$49.51).

<sup>1</sup> From its context, the Company believes that the quoted statement was intended to refer to the 2017 rate floor for voice services.

<sup>2</sup> See Note 5 on the "Data Dictionary" tab of 2017 Results [2017 URS Voice Website Data.xlsx] located from the FCC webpage having the following URL:

<https://www.fcc.gov/general/urban-rate-survey-data-resources>

**FCC FORM 481 (July 2017), Line 1030**  
**Descriptive Document for Compliance of Pricing of**  
**Broadband Services with Required Relationship**  
**To Applicable National Average Urban Rate for Broadband**  
**Service Benchmark, as required by 47 C.F.R. § 54.313(a)(12)**  
**Per Instructions for Completing FCC Form 481**

Section 54.313(a)(12) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 16-362, released April 5, 2016, in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following: "Under the approach adopted by the Bureau in 2014, the reasonable comparability broadband benchmark varies, depending upon the supported service's download and upload bandwidths and usage allowance. [footnote omitted]"

The Public Notice includes a table showing the "benchmark" rate for certain broadband service offerings and provides a URL link to an FCC webpage at which a tool to calculate "benchmarks" for other broadband service offerings may be found. The following table summarizes the broadband service plans offered to consumers by the Company's broadband-providing affiliate and the associated benchmark." as determined from the Public Notice or the "tool" to it refers:

Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Usage Allowance (GB)	Benchmark	Company Affiliate Pricing
1.5	0.768	Unlimited	Not Available	\$29.95
5	1	Unlimited	\$68.87	\$49.95
10	1	Unlimited	\$77.98	\$59.95
30	10	Unlimited	\$93.49	\$77.95
70	20	Unlimited	Not Available	\$99.95
100	30	Unlimited	Not Available	\$119.95

As shown in the above table, each of the three broadband service plans offered to consumers by the Company's affiliate, for which "benchmark" rates are available, are offered at a price that is below the applicable "benchmark."

**FCC FORM 481 (July 2017), Line 3010B  
Certification of Compliance with Public Interest  
Obligations Pertaining to the Taking of Reasonable Steps to  
Provide Broadband Service with Specified Attributes  
and to Requests for Such Service Having Been Met  
Within a Reasonable Time, as required by  
47 C.F.R. § 54.313(f)(1)(i)  
Per Instructions for Completing FCC Form 481**

Section 54.313(f)(1)(i) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

The Company hereby so certifies.

**FCC FORM 481 (July 2017), Line 1210**  
**Terms and Conditions of Voice Telephone Lifeline Plans**  
**Per Instructions for Completing FCC Form 481**

Western Wahkiakum County Telephone Company (the "Company") provides Lifeline service to qualified subscribers throughout the Company's local exchange service area, including in Grays River, Naselle and Rosburg, Washington. Customers may qualify for Lifeline service if certain low-income eligibility requirements are met.

The Company provides flat rate local exchange service to its Lifeline subscribers. It does not offer measured local exchange service or measured Extended Area Service (EAS), so the number of local exchange service and EAS minutes that are provided as part of the Lifeline plan is essentially unlimited. EAS exists between the Company's Grays River and Naselle exchanges.

The company does not provide toll service to its Lifeline subscribers, but does provide access to toll service providers. Company Lifeline subscribers have to choose their own toll service providers. Accordingly, subscribers to the Company's Lifeline service do not incur any Company toll charges, but they may incur toll charges from the toll service providers they select.

Lifeline benefits include credits totaling \$9.25 per month on basic residential voice telephone service. Customers of Wahkiakum West receiving Lifeline credits pay \$16.20 per month for basic telephone service, not including taxes and surcharges.

No Company charges, other than those for the local exchange service and EAS that are included in the Company's Lifeline plan (including the FCC Subscriber Line Charge and E911 charges) are required in order for a qualifying low-income consumer to receive Lifeline service from the Company.